

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

JACQUELYN B. N'JAI,

CIVIL ACTION

Plaintiff,

No. 2:10-cv-01323-NBF

v.

The Honorable Nora Barry Fischer

PITTSBURGH BOARD OF PUBLIC
EDUCATION, IMANI CHRISTIAN
ACADEMY, NAACP, MILTON RAIFORD,
JR., DR. MARON BARNETT, SHERICE
COLES, MAISHA JOHNSON, JASON
WASHINGTON, and DERRICK TURNER,

Electronically filed.

Defendants.

JURY TRIAL DEMANDED

STIPULATION FOR DISMISSAL WITH PREJUDICE

AND NOW, come the parties, PLAINTIFF, JACQUELYN B. N'JAI, PRO SE, and the DEFENDANTS, by and through their undersigned counsel, and pursuant to Fed. R. Civ. P. No. 41(a)(1)(A)(ii), hereby enter into this Stipulation for Dismissal with Prejudice of all claims against DEFENDANTS, IMANI CHRISTIAN ACADEMY, NAACP, MILTON RAIFORD, JR., DR. MARILYN BARNETT (incorrectly identified in the caption as 'Dr. Maron Barnett'), SHERICE COLES, MAISHA JOHNSON, JASON WASHINGTON and DERRICK TURNER, and in support thereof, state as follows:

1. On October 8, 2010, Plaintiff filed this action against the Defendants through the filing of a Motion for Leave to Proceed *in forma pauperis*. [Doc. No. 1]. After receiving leave to proceed *in forma pauperis*, Plaintiff's Complaint was filed on October 12, 2010. [Doc. No. 4].

2. After the filing of Motions to Dismiss by Defendants, Imani Christian Academy, NAACP, Milton Raiford, Jr., Dr. Marilyn Barnett, Sherice Coles, Maisha Johnson, Jason

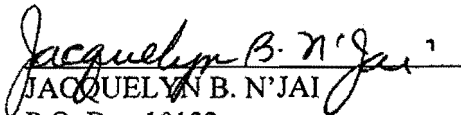
Washington and Derrick Turner, the Plaintiff was granted leave to file an amended complaint. *See*, April 4, 2011 Orders of Court [Doc. Nos. 97-98].

3. On May 2, 2011, Plaintiff filed her Amended Complaint [Doc. No. 106].
4. By way of the instant Stipulation, the parties do hereby agree and stipulate as follows:
 - a. All claims against DEFENDANTS, IMANI CHRISTIAN ACADEMY, NAACP, MILTON RAIFORD, JR., DR. MARILYN BARNETT, SHERICE COLES, MAISHA JOHNSON, JASON WASHINGTON and DERRICK TURNER, shall be dismissed, **with prejudice**;
 - b. DEFENDANTS, IMANI CHRISTIAN ACADEMY, NAACP, MILTON RAIFORD, JR., DR. MARILYN BARNETT, SHERICE COLES, MAISHA JOHNSON, JASON WASHINGTON and DERRICK TURNER, shall be dismissed, **with prejudice**, from this action pursuant to Fed. R. Civ. P. No. 41(a)(1)(A)(ii);
 - c. As part of this Stipulation, all parties agree to bear their own costs and attorneys fees arising out of this action with respect to the claims asserted against DEFENDANTS, IMANI CHRISTIAN ACADEMY, NAACP, MILTON RAIFORD, JR., DR. MARILYN BARNETT, SHERICE COLES, MAISHA JOHNSON, JASON WASHINGTON and DERRICK TURNER.

5. This Stipulation does not pertain to any claims asserted by the Plaintiff against Defendant Pittsburgh Board of Public Education.

Dated: August 11, 2011

Respectfully submitted,


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Pro Se Plaintiff

Respectfully submitted,

MARGOLIS EDELSTEIN


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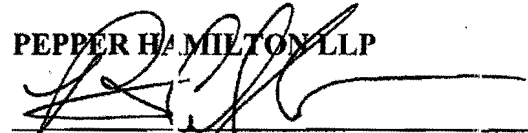
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*Counsel for Defendants, Imani Christian
Academy, Milton Raiford, Jr., Dr. Marilyn
Barnett, Sherice Coles, Maisha Johnson,
Jason Washington and Derrick Turner*

Respectfully submitted,

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Counsel for Defendant NAACP

AND NOW, this 12th
day of August, 2011,
IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE